

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

<p>JEFFREY WONSER, <i>Plaintiff,</i> v. CHARLES L. NORMAN, et al., <i>Defendants.</i></p>	<p>Case No.: 2:24-cv-02160 Judge Sarah D. Morrison Magistrate Judge Elizabeth A. Preston Deavers</p>
<p>MOTION TO MODIFY THE CASE-MANAGEMENT ORDER</p>	

Plaintiff Jeffrey Wonser respectfully moves for an order amending the Court's case-management order.

A case-management schedule may be modified "for good cause and with the judge's consent." Fed. R. Civ. P. 16(b)(4).

Here, the parties stipulated to—and the Court granted—a period of 260 days in which to conduct discovery. ECF # 8. However, after Mr. Wonser served discovery, Defendants sought a protective order and refused to answer while that motion was pending. The Court denied that motion on January 29, but Defendants did not begin producing documents in response to Mr. Wonser's requests until March 14, leaving him only 32 days to follow up on his initial discovery demands, far less than the 260 days the parties had agreed to.

Given their volume, counsel for Mr. Wonser has not yet had a chance to complete his review of the records produced on March 14, let alone advise his client on whether they indicate that depositions or other further discovery is warranted. Likewise, Defendants have served discovery on Mr. Wonser and are still waiting for responses to a portion of their requests for which they granted Mr. Wonser an extension.

Because Defendants unfairly narrowed the discovery window they had agreed to by unilaterally refusing to respond, and because the parties are negotiating in good faith to resolve their discovery disputes, there is good cause for a modification of the case-management schedule. Mr. Wonser therefore requests an extension of 90 days in which to continue pursuing discovery in this matter.

Mr. Wonser has solicited consent to this motion from Defendants. The motion is not unopposed.

Respectfully submitted,

/s/Brian D. Bardwell

Brian D. Bardwell (0098423)
Speech Law, LLC
4403 Saint Clair Ave, Suite 400
Cleveland, OH 44103-1125
216-912-2195 Phone/Fax
brian.bardwell@speech.law
Attorney for Plaintiff Jeffrey Wonser

CERTIFICATE OF SERVICE

I certify that on April 16, 2025, this document was served on opposing counsel as provided by Fed. R. Civ. P. 5(b)(1).

/s/Brian D. Bardwell

Brian D. Bardwell (0098423)
Attorney for Plaintiff Jeffrey Wonser